

# Participating Organizations

Alliance for a Living Ocean  
American Littoral Society  
Arthur Kill Coalition  
Ashbury Park Fishing Club  
Bayberry Garden Club  
Bayshore Regional Watershed Council  
Bayshore Sewer Flycatchers  
Bedford Scafood Coop  
Belmar Fishing Club  
Beneath The Sea  
Bergen Save the Watershed Action Network  
Berkeley Shores Homeowners Civic Association  
Cape May Environmental Commission  
Central Jersey Anglers  
Citizens Conservation Council of Ocean County  
Clean Air Campaign, NY  
Coalition Against Toxics  
Coalition for Peace & Justice/Unplug Salem  
Coast Alliance  
Coastal Jersey Parrot Head Club  
Communication Workers of America, Local 104  
Concerned Business of COA  
Concerned Citizens of Belmar  
Concerned Citizens of COA  
Concerned Citizens of Montauk  
Concerned Students and Educators of COA  
Eastern Monmouth Chamber of Commerce  
Fisher's Island Conservancy  
Fishermen's Conservation Association, NJ Chapter  
Fishermen's Conservation Association, NY Chapter  
Fishermen's Dock Cooperative, Pt. Pleasant  
Friends of Island Beach State Park  
Friends of Liberty State Park, NJ  
Friends of the Boardwalk, NY  
Garden Club of Englewood  
Garden Club of Fair Haven  
Garden Club of Long Beach Island  
Garden Club of RPD Middletown  
Garden Club of Monticello  
Garden Club of New Jersey  
Garden Club of New Vernon  
Garden Club of Oceanport  
Garden Club of Princeton  
Garden Club of Rumson  
Garden Club of Short Hills  
Garden Club of Shrewsbury  
Garden Club of Spring Lake  
Garden Club of Washington Valley  
Great Egg Harbor Watershed Association  
Green Party of Monmouth County  
Green Party of New Jersey  
Highlands Business Partnership  
Holly Club of Sea Girt  
Hudson River Fishermen's Association  
Jersey Shore Captains Association  
Jersey Shore Parrot Head Club  
Jersey Shore Running Club  
Junior League of Monmouth County  
Keyport Environmental Commission  
Kiwanis Club of Manasquan  
Kiwanis Club of Shadow Lake Village  
Leonardo Family & Pleasure Boat Association  
Leonardo Tax Payers Association  
Main Street Wildwood  
Mantoloking Environmental Commission  
Marine Trades Association of NJ  
Monmouth Conservation Foundation  
Monmouth County Association of Realtors  
Monmouth County Audubon Society  
Monmouth County Friends of Clearwater  
National Coalition for Marine Conservation  
Natural Resources Protective Association, NY  
NJ Beach Buggy Association  
NJ Commercial Fishermen's Association  
NJ Environmental Federation  
NJ Environmental Lobby  
NJ Main Ship Owners Group  
NJ Marine Education Association  
NJ PIRG Citizens Lobby  
Nottingham Hunting & Fishing Club, NJ  
NYC Sea Gypsies  
NY State Marine Education Association  
NY/NJ Baykeeper  
Ocean Wreck Divers, NJ  
Padilla-Out.org  
Picatinny Saltwater Sportsmen Club  
Raritan Riverkeeper  
Religious on Water  
Riverside Drive Association  
Rotary Club of Long Branch  
Rotary District #510-Interarea  
Saltwater Anglers of Bergen County  
Sandy Hook Bay Anglers  
Save Barnegat Bay  
Save the Bay, NJ  
SEAS Monmouth  
Seaweeders Garden Club  
Shark Research Institute  
Shark River Cleanup Coalition  
Shark River Surf Anglers  
Shore Adventure Club  
Sierra Club, NJ Shore Chapter  
Sisters of Charity, Maria Stella  
Sons of Ireland of Monmouth County  
Soroptimist Club of Cape May County  
South Jersey Diver Club  
South Monmouth Board of Realtors  
Station Island Tuna Club  
Strathmore Fishing & Environmental Club  
Surfers' Environmental Alliance  
Surfrider Foundation, Jersey Shore Chapter  
TACK 1, MA  
Terra Nova Garden Club  
Three Harbors Garden Club  
Congregation/Mosque, Cay  
United Boatmen of NY/NJ  
Village Garden Club  
Volunteer Friends of Bowers, NJ  
WATERSPIRIT  
Women's Club of Brick Township  
Women's Club of Eeyport  
Women's Club of Long Branch  
Women's Club of Merchantville  
Women's Club of Spring Lake  
Women Gardeners of Ridgewood  
Zen Society



Ocean Advocacy  
Since 1984

# Clean Ocean Action

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June 22, 2009

Docket Coordinator Headquarters  
US Environmental Protection Agency  
CERCLA Docket office  
Mail Code 5305T  
1200 Pennsylvania Avenue  
Washington, DC 20460

RE: Raritan Bay Slag – EPA-HQ-SFUND-2009-0062

Dear Docket Coordinator,

I write on behalf Clean Ocean Action (COA) and the Bayshore Regional Watershed Council. COA is a broad-based coalition of 125 conservation, environmental, fishing, boating, diving, student, surfing, women's, business, service, and community groups and also represents concerned citizens and businesses. Our goal is to improve the degraded water quality of the marine waters off the New Jersey/New York coast. The Bayshore Regional Watershed Council is dedicated to the restoration, protection, sustainable use, and enjoyment of Raritan Bay – Sandy Hook Bay and the watershed region.

We urge the United States Environmental Protection Agency (USEPA) to designate the Raritan Bay Slag site for inclusion on the National Priority List, also known as Superfund. COA also supports USEPA's conducting this action by using the Emergency Removal Branch.

USEPA must continue to expedite this investigation and cleanup through the Emergency Removal Branch and must assign the remedial portion of this site to their most qualified person possible. The agency must be aggressive in its approach to getting the investigation complete, and stay motivated to seek public input and fast-track the cleanup. This is not a site USEPA should assign to someone with limited experience, or to someone who will not devote 100 percent both personally and professionally.

There are some environmental justice concerns for the affected region. The USEPA must ensure that Environmental Justice as defined by the agency as *"the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies"* is carried out during this Superfund remediation process.

We also request that the USEPA:

- Complete the investigation and remediation of the beach, jetty, sea wall and contaminated sediments through the emergency removal branch.
- Document the full extent of contamination in the region, as lead particles may have been transported by rain and runoff as well as the movement of water and sediments due to currents and tides. Remediate any additional contaminated areas that are identified in a timely manner.
- Maintain an USEPA office on-site and conduct an expedited and consistent outreach campaign to the Raritan Bayfront communities and Raritan Bay users across the region.

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- Immediately establish a Community Advisory Group (CAG) that includes representation from all affected groups and individuals, including fishermen, boaters, communities, advocacy groups, and residents along the entire Raritan Bayfront.
- Produce a detailed fact sheet and set up an 'ftp' file-sharing site to publicly upload documents and information as soon as they are available.
- Produce fact sheets in several languages and actively and aggressively inform the public, fishermen and boaters of all of USEPA's facts, data, restrictions, and plans. Distribute to all regional marinas, bait shops, and stores in the Raritan Bayshore area.
- Conduct extensive bioaccumulation testing on worms, clams, crabs, and fish, especially the fish being consumed by subsistence fisherman, from the affected regions and determine health risks and ecological criteria.
- Include a portion of the El Paso Energy site on River Drive/Industrial Avenue in the Keasbey section in Woodbridge, NJ as a portion of the Hartman's pond on site is constructed of the same slag material
- Include any additional slag sites located in the Raritan Bay complex found in the course of the investigation

The fact that this contamination has been well known and ignored for years is scandalous. It has resulted in years of public and aquatic life exposure with untold adverse impacts. Furthermore, this site is an environmental and public health tragedy. The contamination has further restricted beach and waterfront access and has likely decreased real estate values, fishing activities, tourism, and recreational usage of the shore. Until it is fully cleaned up, the contamination has a severe negative impact on the economy of the Raritan Bayshore community and businesses. As such, the USEPA must do everything it possibly can to assign the right team to this site and expedite the investigation and cleanup of all slag and slag-related contamination and ensure environmental justice for the affected region.

Sincerely,



Cynthia Zipf  
Executive Director

Joseph Reynolds  
Co-Chair, Bayshore Regional Watershed Council

cc: President Barack Obama  
Senator Frank Lautenberg  
Senator Robert Menedez  
Congressman Frank Pallone  
Governor Jon Corzine  
US EPA Administrator Lisa Jackson  
US EPA Community Coordinator Pat Seppi